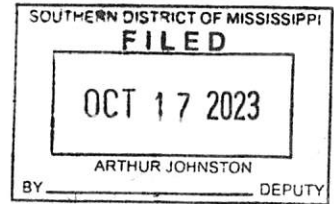


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
WESTERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. **5:23-cr-10-DCB-LGI**

BRANDON SCOTT FAVRE, and  
JASON DANIEL MARTIN

18 U.S.C. § 371  
16 U.S.C. § 3372(a)(1)  
16 U.S.C. § 3373(d)(2)

**The United States Attorney charges:**

At all times relevant to this information:

1. Mistletoe Properties, LLC is a permitted 850 acre high-fence enclosure for white-tailed deer used for hunting located in Adams County, Mississippi.
2. Brandon Scott Favre is a resident of Baton Rouge, Louisiana, and is the owner of Mistletoe Properties; additionally, Favre is a part owner of Performance Contractors—an industrial construction company with locations in Baton Rouge and Lake Charles, Louisiana, Corpus Christi and Houston, Texas, and Mobile, Alabama.
3. Jason Daniel Martin is a resident of Hackberry, Louisiana, and owned and operated Silver Eagle Whitetails, a two-acre white-tailed deer enclosure, located in DeQuincy, Louisiana.
4. Mississippi Code Annotated § 49-7-54 makes it “unlawful to import and translocate live white-tailed deer into this state ... [and] the commission shall establish regulations governing the importation of white-tailed deer with emphasis on preventing the introduction of diseases.”
5. The Mississippi Board of Animal Health, through its regulations, has declared that white-tailed deer ... are considered CWD (chronic wasting disease) susceptible animals and are not allowed entry into Mississippi ... it is illegal to import white-tailed deer into Mississippi. 2 Miss. Admin. Code Pt. 101, Subpt. 2, Ch. 12, Sec. 114.02(4).
6. Louisiana Administrative Code requires “[a]ny person who keeps, breeds, raises, contains, harvests, ... buys, sells, trades, or transfers ownership of any type of farm-raised alternative livestock for commercial purposes shall obtain a farm-raising license, ... prior to engaging in such activity.” 7 LA ADC Pt XXI, § 1707.

Additionally, “[e]ach licensee shall maintain records, for not less than 60 months, of all sales, deaths, kills, trades, purchases, or transfers of any farm-raised alternative livestock. 7 LA ADC Pt XXI, § 1715.

7. Federal law makes it unlawful to transport live white-tailed deer from one state to another without proper documentation of the animals and without required animal health records. These records include certifying that captive-bred animals are free from diseases such as chronic wasting disease, tuberculosis, and brucellosis. 9 C.F.R. §§ 81.2 – 81.5 and 86.1.
8. Chronic wasting disease is the chief threat to wild deer and elk populations in North America. The disease, which ultimately ends in the death of infected animals, is a transmissible neurological disease that produces small lesions in the brain of deer and elk and is characterized by loss of body condition and behavioral abnormalities.

### CONSPIRACY

That from on or about October 1, 2020, and continuing until on or through June 2021, in Adams County, Mississippi, and elsewhere, the defendants, BRANDON SCOTT FAVRE, and JASON MARTIN, did knowing and willfully conspire with each other and with others known and unknown, to commit the following actions against the United States as follows:

To knowingly import, transport, acquire, sell, purchase, and receive live white-tailed deer that were transported in violation of a law, treaty, or regulation of the United States, and knew or in the exercise of due care should have known that the white-tailed deer was possessed, sold, and transported in violation of a law and regulation of the United States, that is, in violation of 9 C.F.R. §§ 81.2 – 81.5 and 86.1, 7 U.S.C. § 8301 et seq., 7 LA ADC Pt XXI, §§ 1707 and 1715, all in violation of 16 U.S.C. §§ 3372(a)(1) and 3373(d)(2).

It was a part of the conspiracy that the defendants would purchase and unlawfully transport and receive into the state of Mississippi live white-tailed deer from locations outside

the state of Mississippi, without authority to do so in violation of both federal and state laws.

It was further part of the conspiracy that the defendant would unlawfully bring the live white-tail deer into the state of Mississippi for the purpose of breeding and killing trophy white-tailed deer.

In furtherance of the conspiracy and to carry out its objectives in the Southern District of Mississippi, the defendants and others committed and caused to be committed overt acts including, but not limited to, the following:

1. Sometime prior to April 1, 2021, defendant FAVRE entered a partnership or agreement with defendant MARTIN to purchase, transport, and receive from outside the state of Mississippi into the state of Mississippi live white-tailed deer for hunting;
2. Defendant MARTIN agreed to transport a white-tailed deer from the state of Louisiana into the state of Mississippi;
3. Defendant MARTIN did not obtain a farm-raising license prior to raising, selling, trading, or transferring ownership of the live white-tailed doe deer in violation Louisiana law;
4. Defendant MARTIN did not maintain records of the sale, trade, or transfer of the live white-tailed doe deer in violation of Louisiana law;
5. Defendant Martin did not maintain proper documentation and required health records of the live white-tailed doe deer, including a certification that the live white-tailed doe deer was free from diseases such as chronic wasting disease, tuberculosis, and brucellosis. 9 C.F.R. §§ 81.2 – 81.5 and 86.1;

6. In or prior to April 2021, defendant MARTIN transported and delivered a white-tailed deer from the state of Louisiana to Mistletoe Properties located in the state of Mississippi. Defendant FAVRE instructed a caretaker of Mistletoe Properties to receive the white-tailed deer and placed it into an unpermitted breeding pen located at Mistletoe Properties in Adams County, Mississippi.

All in violation of Title 18, United States Code, Section 371.



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TODD W. GEE  
United States Attorney